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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re	)	Case No. 16-30406-rld11
	)	
SeaPort Airlines, Inc.,	)	
	)	
Debtor-in-Possession.	)	
SeaPort Airlines, Inc.,	)	Adv. Pro. No. 16-03059-rld
	)	
Plaintiff,	)	DECLARATION OF
	)	NELSON D. ATKIN, II IN SUPPORT OF
vs.	)	PLAINTIFF'S MOTION FOR
	)	TEMPORARY RESTRAINING ORDER
Robert McKinney,	)	
	)	
Defendant.	)	

I, Nelson D. Atkin, II declare as follows:

1. I am an attorney, licensed to practice in the State of Oregon.
2. I have practiced in the area of labor and employment law for forty-two years and possess knowledge and expertise in the areas of law about which I now testify.
3. I have reviewed the statute and regulations applicable to whistleblower complaints filed with the Occupational Health and Safety Administration, such as the one filed by Robert McKinney, at issue in the instant case. The only remedies available under

the statute and regulations governing such whistleblower complaints are remedies in favor of the complainant, including monetary damages or in appropriate cases, reinstatement as an employee.

Dated this 13th day of May, 2016.

By: /s/Nelson D. Atkin, II  
Nelson D. Atkin, II, Declarant

In re SeaPort Airlines, Inc.;  
Chapter 11 Bankruptcy Case No. 16-30406-rld11  
SeaPort Airlines, Inc. v. Robert McKinney;  
Adv. Pro. No. 16-03059-rld

CERTIFICATE - TRUE COPY

DATE: May 13, 2016

DOCUMENT: DECLARATION OF NELSON D. ATKIN, II IN SUPPORT OF  
PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING  
ORDER

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc.  
Attn: Timothy Sieber  
816 SW First Avenue  
Portland, Oregon 97204

Rob McKinney  
9502 NE 144th Ct  
Vancouver, WA 98682

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: May 13, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos  
Robert J Vanden Bos, OSB #78100  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #07350  
Of Attorneys for Debtor-in-Possession